

585 STEWART AVENUE
SUITE 615
GARDEN CITY, NY 11530
TEL: 516.858.5887
FAX: 516.858.5867

## MEMO ENDORSED

November 25, 2024

## VIA ECF

Hon. Edgardo Ramos United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 The application is X granted denied

Edgardo Ramos, U.S.D.J

Dated: 11/25/2024 New York, New York

RE: Juan Igartua v. BK Exotic Outlet, LLC

United States District Court for the Southern District of New York

Docket No.: 1:24-cv-07091(ER)

Dear Judge Ramos:

My sincere apologies for addressing the previous letter to Judge Liman. I am counsel for the defendant in this action. The parties are currently exploring the possibility of a resolution of this matter. In furtherance of these efforts, I respectfully request an extention the time to answer the compliant.

Accordingly, respondents respectfully request that the time for filing an answer be extended by 30 days, to and including December 8, 2024. Because the 30-day period ends on a Sunday we respectfully request the deadline be extended to Monday, December 9, 2024. Counsel for the plaintiff, Juan Igartua, has informed me by telephone that the plaintiff does not object to this request.

Sincerely.

Michael James, Esq.

cc: Mitch Pomerance, Esq.
Joseph & Norinsberg, LLC
mitch@employeejustice.com